



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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DALLAS, TX 75202-2733

000141

November 16, 1993

Ms. Jean A. Mescher
Project Coordinator
Manager, Environmental and Engineering Services
McKesson Corporation
One Post Street
San Francisco, California 94104-5296

Dear Ms Mescher:

The Environmental Protection Agency (EPA) agreed to McKesson's proposed phased approach for the Remedial Design/Remedial Action (RD/RA) project described in your correspondence dated July 28, 1993 via verbal approval given at our meeting in Little Rock on August 5. This letter is meant to clarify that approval in view of the recent design submittal dated October 29, 1993. The following considerations require documentation in order to maintain compliance with the Consent Decree and existing RD Work Plan for the Arkwood Site.

First, EPA acknowledges that the content of the approved Preliminary Engineering Report (PER) was comparable to a Preliminary (30%) RD Submittal. With this in mind, EPA agreed to waive a separate 30% RD Submittal on the basis that the technical requirements of the 30% RD Submittal had already been met via the PER.

Secondly, EPA acknowledges that certain provisions need to be delineated, given mutual understanding and agreement by McKesson:

1. Definitions

◆ Phase I will be considered an "Interim Action" for the Arkwood Site consisting of the pretreatment and storage stage of the remedy specified in the Record of Decision and Consent Decree. Phase I will also include those backfill activities which must be completed to minimize adverse environmental impacts prior to implementation of Phase II (i.e., backfill of material meeting clean up objectives, as discussed in our August 5th meeting in Little Rock).

◆ Phase II will be considered the "Final Action" for the Arkwood Site consisting of the incineration and site closure stage of the remedy specified in the Record of Decision and Consent Decree. Phase II will include all those required activities not completed in Phase I.

2. Deliverables

Phase I, Interim Action (Pretreatment & Storage).

◆ For the Phase I RD, one "60/90 %" and one "100 %" design submittal will be completed. As discussed in our August 5th meeting, EPA and the Arkansas Department of Pollution Control and Ecology (ADPC&E) will honor those shortened agency review times outlined in your July 28th correspondence. However, EPA requests that review copies be submitted to all parties concurrently (inclusive of EPA's oversight contractor). Also, a "Preliminary Remedial Action Plan (P-RAP)" is required for approval prior to implementation of the Phase I RA. All of the submittals required for Phase I will be subtitled "Phase I, Interim Action (Pretreatment & Storage)", in order to distinguish these documents from the Phase II RD/RA project activities.

Phase II, Final Action (Incineration & Site Closure).

◆ All submittals initially planned for in the Consent Decree (which did not envision a phased approach) are still required, with the exception of the 30% design submittal, being waived as indicated above. The 60% through the 100% design submittals, and Final RAP submittal will be subtitled "Phase II, Final Action Incineration & Site Closure" in order to distinguish these documents from the Phase I RD/RA project activities. Review times (durations) will remain as specified in the Consent Decree and RD Work Plan for these submittals. In addition, other activities outlined in the Consent Decree, which are scheduled in accordance with completion of the RAP and RA, will be so scheduled based upon the Final RA activities (Phase II).

Finally, EPA acknowledges that a phased approach for the RD/RA project should result in several benefits for all parties of concern:

- 1) The Interim Action represents a means of decreasing the long term risk posed by the Arkwood Site over the short term, while the design of the Final Action proceeds.
- 2) The Final Action may proceed more efficiently than typical of incinerator projects, since implementation of the Interim Action will allow several unknowns to be defined prior to completing the incinerator design.
- 3) Scheduling of remedial activities during the summer months may alleviate technical concerns with regard to moisture content of the soils. In addition, the fact that the remedial activities are planned for the summer months may reduce the anxiety of the local community, given the location of the school in relation to the site.

With these benefits in mind, EPA remains willing to work with McKesson to meet the proposed schedule for the Interim Action. However, as discussed in our conference call on November 12, 1993, the recent 60%/90% Interim Action RD submittal, dated October 29, 1993, needs additional detail and specifications prior to EPA providing constructive comments for incorporation into the 100% Interim Action RD submittal. Although the level of detail described in Section 2.4 of the Arkwood RD Work Plan may not be necessary since the Interim Action project will not be "bid out", a work plan amendment will be necessary to omit certain details for the Phase I RD project submittals (i.e., Construction Specification Institute [SCI] format).

Therefore, I have directed Weston to not prepare a detailed comment letter on the October 29th submittal at this time, since additional critical information will be forthcoming prior to the 100% submittal. Rather, as we discussed in our conference call, Weston has prepared a list of the type of details which are necessary for the Interim Action 60%/90% design submittal. Weston's correspondence is enclosed for your review. As specifications and drawings are completed and submitted, we will review material and prepare our comments appropriately. Please indicate at what point the 60%/90% submittal is complete to facilitate issuance of our final comments.

I hope this clarification helps in your preparation of a Work Plan Amendment and your continued efforts on the Interim Action design. If I can be of further assistance, do not hesitate to call me at (214)655-6772. Thank you for your continued effort to address EPA and ADPC&E's concerns.

Sincerely,

Cynthia J. Kaleri

Cynthia J. Kaleri
Remedial Project Manager (6H-EA)
Project Coordinator - Arkwood Site

Enclosure

cc: Bob Barker (McKesson Service Merchandising Co.)
Dinah Szander (McKesson Corporation)
Allan Gates (Mitchell, Williams, Selig & Tucker)
Molly Hall (Department of Justice)
Jon Weisberg (EPA Assistant Regional Counsel)
Sam Becker (EPA Chief, Superfund Enforcement Branch)
Michael Arjmandi (ADPC&E)
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